

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In Re: ) Chapter 11  
 )  
CORE SCIENTIFIC, INC., *et al*, ) Case No. 22-90341  
 )  
Debtors.<sup>1</sup> ) (Jointly Administered)  
 )

**HARLIN DEAN'S LIMITED OBJECTION TO PLAN AND NOTICE OF OPT OUT RELEASE ELECTION**

Harlin Dean hereby files this limited objection to plan and notice of opt out release election (“Limited Objection”) regarding the Third Amended Joint Chapter 11 Plan of Core Scientific, Inc. and its Affiliated Debtors [Docket No. 1438] (as it may be supplemented or amended, the “Plan”), as follows:

1. The Plan provides that, upon confirmation, Releasing Parties will be deemed to have granted releases to certain third parties. Plan § 10.6(b).
2. Mr. Dean here provides notice that he opts out of any releases in the Plan and objects to the imposition of any nonconsensual third-party release. *See, e.g., In re Pac. Lumber Co.*, 584 F.3d 229, 252-53 (5th Cir. 2009).
3. Mr. Dean requests that any order confirming the Plan clarify that he is not a “Releasing Party” under the Plan or otherwise providing a nonconsensual third-party release.
4. Mr. Dean additionally incorporates by reference any other objections to the Plan or Disclosure Statement by other parties in this case.

Respectfully submitted,

/s/ Hudson M. Jobe  
HUDSON M. JOBE  
State Bar No. 24041189  
GREGORY M. SUDBURY  
State Bar No. 24033367

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Core Scientific Mining LLC (6971); Core Scientific, Inc. (3837); Core Scientific Acquired Mining LLC (N/A); Core Scientific Operating Company (5526); Radar Relay, Inc. (0496); Core Scientific Specialty Mining (Oklahoma) LLC (4327); American Property Acquisition, LLC (0825); Starboard Capital LLC (6677); RADAR LLC (5106); American Property Acquisitions I, LLC (9717); and American Property Acquisitions, VII, LLC (3198). The Debtors’ corporate headquarters and service address is 210 Barton Springs Road, Suite 300, Austin, Texas 78704.

**QUILLING, SELANDER, LOWNDS, WINSLETT & MOSER,  
P.C.**

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**ATTORNEYS FOR HARLIN DEAN**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2023, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

*/s/ Hudson M. Jobe*  
Hudson M. Jobe